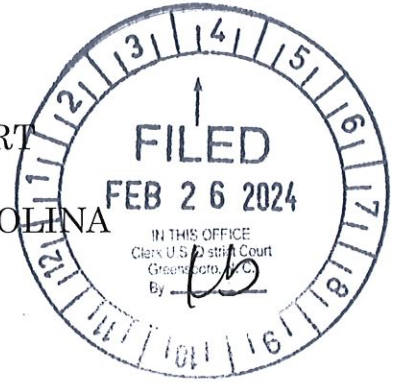


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

TY JAMES STEPHENSON

1:24CR 55 -1

The Grand Jury charges:

COUNT ONE

On or about February 10, 2023, in the County of Durham, in the Middle District of North Carolina, TY JAMES STEPHENSON did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT TWO

On or about February 10, 2023, the exact date to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, TY JAMES STEPHENSON did knowingly distribute and attempt to distribute

any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT THREE

On or about June 23, 2023, in the County of Durham, in the Middle District of North Carolina, TY JAMES STEPHENSON did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FOUR

On or about August 18, 2023, in the County of Durham, in the Middle District of North Carolina, TY JAMES STEPHENSON did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting

interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FIVE

On or about August 18, 2023, in the County of Durham, in the Middle District of North Carolina, TY JAMES STEPHENSON did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT SIX

On or about August 21, 2023, in the County of Durham, in the Middle District of North Carolina, TY JAMES STEPHENSON did knowingly possess any material which contained an image of child pornography, that involved a prepubescent minor and a minor who had not attained 12 years of age, as defined in Title 18, United States Code, Section 2256(8)(A), which had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of one or more of the offenses alleged in this Indictment, the defendant, TY JAMES STEPHENSON, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of the United States Code; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or promote the commission of the offense or any property traceable to such property.


3. The property subject to forfeiture pursuant to paragraph 2 above may include, but shall not be limited to, the following property of the defendant seized on or about August 21, 2023:

- a. Samsung Mobile Phone, Model SM-A5260 Galaxy A52 5G, bearing IMEI:350183735820938.

All in accordance with Title 18, United States Code, Section 2253, Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: February 26, 2024

SANDRA J. HAIRSTON
United States Attorney



BY: K. P. KENNEDY GATES
Assistant United States Attorney

A TRUE BILL:

FOREPERSON

